

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ANDREA TANTAROS,

Petitioner,

19-cv-7131 (ALC)

v.

FOX NEWS NETWORK, LLC., WILLIAM  
SHINE, THE ESTATE OF ROGER AILES,  
SUZANNE SCOTT, IRENA BRIGANTI,  
AND DIANNE BRANDI,

Respondents.

**DECLARATION OF CARA E. GREENE**  
**IN OPPOSITION TO RESPONDENTS FOX NEWS NETWORK, LLC, SUZANNE**  
**SCOTT, DIANNE BRANDI AND IRENA BRIGANTI'S MOTION TO DISMISS (ECF**  
**NO. 100), WILLIAM SHINE'S MOTION TO DISMISS (ECF NO. 103) AND THE**  
**ESTATE OF ROGER AILES' MOTION TO DISMISS (ECF NO. 104)**

I, Cara E. Greene, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am a partner at the law firm of Outten & Golden LLP, counsel of record for Petitioner Andrea Tantaros. I make these statements based on personal knowledge in Opposition to Respondents' Motions to Dismiss (ECF Nos. 100, 103, and 104).

2. Attached hereto as **Exhibit 1** is a true and correct copy of Complaint filed by Petitioner in the New York State Supreme Court, Index No. 157054/2016. On March 9, 2017, the court compelled her to arbitration in AAA.

3. On or about May 5, 2017, Petitioner filed her counterclaims against Respondents in the AAA arbitration Fox News had previously commenced against her ("Arbitration"). The administrative fee for her counterclaims of discrimination and retaliation was \$13,000, more than

37 times the amount for commencing a federal court action and more than 60 times the amount required to commence a state court action.

4. Attached hereto as **Exhibit 2** is a true and correct copy of Exhibit A to Petitioner's Employment Agreement.

5. Attached hereto as **Exhibit 3** is a true and correct copy of March 16, 2016, Letter from Petitioner's entertainment attorney to Respondent Fox News Network, LLC ("Fox News").

6. Attached hereto as **Exhibit 4** is a true and correct copy of Petitioner's Summary Invoice/Statement in the Arbitration, dated January 17, 2022.

7. Attached hereto as **Exhibit 5** is a true and correct copy of Order in Arbitration, dated April 12, 2019.

8. Attached hereto as **Exhibit 6** is a true and correct copy of Fox News' Demand for Arbitration.

9. Attached hereto as **Exhibit 7** is a true and correct copy of Conciliation Agreement between the New York City Commission on Human Rights ("NYCCHR") and Fox News, with NYCCHR's Complaint against Fox News attached thereto as Exhibit A.

10. Attached hereto as **Exhibit 8** is a true and correct copy of AAA's August 9, 2016 letter regarding fee schedule.

11. Attached hereto as **Exhibit 9** is a true and correct copy of Order in Arbitration, dated January 21, 2019.

12. Attached hereto as **Exhibit 10** are true and correct copies of relevant pages from Petitioner's Motion to Compel filed in Arbitration, dated October 2, 2018.

13. Attached hereto as **Exhibit 11** is a true and correct copy of is a true and correct copy of Cycura report regarding Petitioner's Blackberry.

14. Attached hereto as **Exhibit 12** are true and correct copies of relevant pages from Petitioner's Opposition to Fox News' Motion to Compel filed in Arbitration, dated November 13, 2018.

15. Attached hereto as **Exhibit 13** is a true and correct copy of a letter from Petitioner to the Arbitration Panel, dated April 5, 2019.

16. Attached hereto as **Exhibit 14** is a true and correct copy of a Cycura report dated August 6, 2017.

17. Attached hereto as **Exhibit 15** is a true and correct copy of an Order in *In re Estate of Roger Ailes*, Case No. 50-2017-CP-003091 -MB, dated April 23, 2019.

18. Attached hereto as **Exhibit 16** is a true and correct copy of Index No. 652130/2018, May 1, 2018 Memorandum of Law in Support of the Order to Show Cause for a Temporary Restraining Order and Preliminary Injunction.

19. Attached hereto as **Exhibit 17** is true and correct copy of Index No. 652130/2018, May 16, 2018 Oral Argument Transcript, Doc. No. 52.

20. Attached hereto as **Exhibit 18** is true and correct copy of Index No. 652130/2018, November 6, 2019 Order, Doc. No. 57.

Dated: January 20, 2022  
New York, New York

/s/ Cara E. Greene  
Cara E. Greene

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